

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Complaint of Covad Communications Company and  
AT&T Communications of New England, Inc.  
Regarding Collocation Power Charges Assessed by  
Verizon New England, Inc.

D.T.E. 01-39

**AT&T COMMUNICATIONS OF NEW ENGLAND, INC. AND  
COVAD COMMUNICATIONS COMPANY'S  
FIRST SET OF INFORMATION REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. ("AT&T") and Covad Communications  
Company ("Covad") hereby submit to Verizon the following information requests.

**INSTRUCTIONS**

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

## INFORMATION REQUESTS

1. Referring to pages 2 –3 of the Answer of Verizon Massachusetts to the Complaint in this proceeding, Verizon states “before evidentiary hearings even began in D.T.E. 98-57, Verizon MA witnesses testified concerning the manner in which Verizon MA applied power charges.”
  - a) Identify all witnesses referred to in this statement;
  - b) Identify proceedings in which they testified;
  - c) Provide copies of their prefiled testimony;
  - d) Identify in each piece of prefiled testimony the specific language to which Verizon’s answer refers;
2. Referring to pages 2 –3 of the Answer of Verizon Massachusetts to the Complaint in this proceeding, Verizon states “before evidentiary hearings even began in D.T.E. 98-57, . . . Verizon MA provided CLECs with information regarding the charges.”
  - a) Identify all occasions in which Verizon provided AT&T and Covad with such information;
  - b) Identify the approximate dates when such information was provided to AT&T and Covad;
  - c) Identify the names and titles of the Verizon representatives who provided such information;
  - d) Identify the names of CLECs other than AT&T and Covad and the individual representatives of each such CLEC who received such information;
  - e) Provide copies of the information provided.
3. Referring to page 4 of the Answer of Verizon Massachusetts to the Complaint in this proceeding, Verizon states that “AT&T and Covad received multiple explanations concerning the application of the charges while the tariff was being reviewed before Department approval.”
  - a) Identify all such “multiple occasions,” by the proceeding or other occasion, in which such explanations were provided;
  - b) Identify the approximate dates when such explanations were provided to AT&T and Covad;

- c) Identify the names and titles of the Verizon representatives who provided such explanations;
  - d) Describe the substance of such explanations;
  - e) If such explanations were written or transcribed, provide copies.
4. Referring to pages 7-8 of the Answer of Verizon Massachusetts to the Complaint in this proceeding, Verizon quotes from its letter to the Department dated February 1, 2001 that the proposed change in D.T.E. Tariff 17 regarding DC power rates “was intended to address an issue that was raised in Verizon MA’s initial 271 filing with the FCC regarding the application of power rates.” Verizon then “denies the allegations to the extent it implies that there is any past or present ‘issues’ regarding DC power which the Department need address.” Please explain and reconcile the apparent inconsistencies in the two statements quoted.
5. Please provide in detail the basis for Verizon’s belief, as stated on page 9 of its Answer, that “the Complainants may have incorrectly ordered power.”
6. Please describe how “CLECs in Massachusetts have an opportunity to review their applications with Verizon MA to understand how all rates would be applied to their collocation arrangements,” as stated on page 9 of Verizon’s Answer.
- a) Identify such opportunities provided to AT&T;
  - b) Identify representatives from Verizon and from AT&T who have communicated together with respect to such application review opportunities;
  - c) Identify the approximate dates that such reviews with AT&T occurred;
  - d) Describe the substance of the communications with respect to such reviews of AT&T applications;
  - e) Identify the specific AT&T Collocation Applications for DC power that were reviewed;
  - f) Identify such opportunities provided to Covad;
  - g) Identify representatives from Verizon and from Covad who have communicated together with respect to such application review opportunities;
  - h) Identify the approximate dates that such reviews with Covad occurred;
  - i) Describe the substance of the communications with respect to such reviews of

Covad applications;

- j) Identify the specific Covad Collocation Applications for DC power that were reviewed.
7. Identify CLECs who, prior to the date of the filing of the Complaint in this proceeding, have “revised their original power requirements after these discussions,” as stated on page 9 of Verizon’s Answer, including:
    - a) how such power requirements were revised, particularly in terms of amps requested, feeds requested, and fusing of feeds;
    - b) the approximate dates such revisions occurred;
    - c) and provide the documentation from the CLEC supporting such revision request.
  8. Identify CLECS and respective collocation arrangements in which “the maximum amount of power that their equipment can draw” has not been identified to Verizon, as stated on page 9 of Verizon’s Answer.
  9. Provide copies of any and all reports, compilations, analyses and spreadsheets based on data collected in February 2001 of power feeds serving CLECs, referred to on page 10 of Verizon’s Answer. Identify and provide all original data from such data collection activities related to collocation arrangements of the plaintiffs in this proceeding, including but not limited to the specific drained amps provided on each feed to the plaintiffs.
  10. Provide a basis for the statement on page 10 of Verizon’s Answer that an “A&B Feed Pair” “reflects engineering practice and the historic industry preference.”
    - a) Provide copies of all manuals, handbooks, contracts, memoranda or other written source for this claim concerning engineering practice and historic industry preference;
    - b) Identify the person at Verizon who was the source for the information that an “A&B Feed Pair” “reflects engineering practice and the historic industry preference.”
  11. Identify any and all occasions in which CLECs “have blown fuses within their collocation arrangements,” as stated on page 11 of Verizon’s Answer; with respect to each such incident, identify the name of the CLECs, the collocation site, the amount of load amps requested by the CLEC, the amount of amps provided, and the fuse capacity of the feed; provide copies of any and all

related incident reports and describe any evidence of equipment malfunction causing the blown fuse(s).

12. With respect to “established engineering practices,” “established engineering principles” and “established industry practice” referred to in paragraphs 13 and 14 of Verizon’s Answer, provide copies of excerpts from manuals, handbooks or memoranda that support Verizon’s practice of fusing feeds at capacities up to 1.5 times loads.
13. Identify procedures, work orders or directives used by Verizon to determine and provide the capacity of fuses used for given levels of load amps on feeds requested by CLECs, and identify, by name, title, department, experience and training, the Verizon personnel who make such determinations for feeds provided to the defendants.
14. Explain how precise fuse capacities on feeds are determined within the range of capacities that are 1.25 to 1.50 times the load amps, as stated in paragraph 14.
15. Provide a copy of Verizon’s collocation cost study, referred to in paragraph 29 of Verizon’s Answer.
16. Identify, by name, title, department, experience and training, the Verizon personnel who drafted and approved the Collocation Application form.
17. Referring to the Collocation Application form in use prior to the filing of this Complaint:
  - a) Explain how a CLEC can request on the application a single A feed, but not a B feed;
  - b) Explain how a CLEC can request on the application an odd, rather than even, number of A (or B) feeds;
  - c) Is it possible for a CLEC to request, by means of the application, a specific amount of DC power in load amps, independent from the number of feeds it requests? If so, what is the procedure for doing so, and how is a CLEC to know of this procedure?
18. Apart from the Collocation Application, what is the procedure, if any, by which a CLEC may request an amount of power in load amps, independent from the number of feeds it requests?
19. Referring to the attached list of collocation sites occupied by AT&T and Covad (Attachment A to this First Set of Information Requests),

- a) Please state whether Verizon agrees or disagrees that this list identifies each and every collocation site subject to the terms of the intrastate tariff;
- b) If Verizon believes that certain collocation sites listed in Attachment A are not subject to terms of the intrastate tariff, please identify each and every such collocation site;
- c) If Verizon believes that additional collocation sites not listed in Attachment A are subject to the intrastate tariff, please identify each and every such collocation site;
- d) For each collocation site listed in Attachment A and any additional sites identified in Verizon's response to Information Request No. 19(c), identify the first effective date on which Verizon deemed the site subject to and for which AT&T was assessed charges for DC power;
- e) For each collocation site listed in Attachment A and any additional sites identified in response to Information Request No. 19(c), identify the type of collocation (traditional physical or virtual);
- f) For each collocation site listed in Attachment A and any additional sites identified in response to Information Request No. 19(c), state the number of square feet provided;
- g) Identify the number of feeds provided at each site listed in Attachment A and at any additional sites identified in Verizon's response to Information Request No. 19(c). For purposes of this Information Request No. 19, a "feed" is defined as a single line feed, not a feed pair, (in the terms of the Collocation Application, an A or a B feed, but not an A and B feed pair). If this number has changed between the first effective dates of charging for DC power identified in Information Request No. 19(d) and the filing of the Complaint in this proceeding, identify how and when such change(s) occurred;
- h) Identify the fused amp capacity delivered by means of each feed identified in Information Request No. 19(g). If this number has changed between the first effective dates of charging for DC power identified in Information Request No. 19(d) and the filing date of the Complaint in this proceeding, identify how and when such change(s) occurred;
- i) Identify the maximum load amp capacity for which each feed identified in Information Request No. 19(g) was designed. If this number has changed between the first effective dates of charging for DC power identified in Information Request No. 19(d) and the filing date of the Complaint in this

proceeding, identify how and when such change(s) occurred;

- j) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), identify the total load amps that Verizon is able to deliver through the total number of feeds provisioned;
- k) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), identify the total load amps that AT&T equipment located at such site is capable of drawing;
- l) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), provide copies of each and every bill for DC Power charges from the first effective date as identified in Information Request No. 19(d) until the filing date of the Complaint in this proceeding;
- m) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), provide copies of Collocation Applications, including any and all application amendments and other correspondence relating to DC power requirements as requested by AT&T;
- n) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), identify what Verizon contends is the amount of DC load amps requested, ordered, or applied for by AT&T at each site;
- o) If Verizon contends that unwritten communications have occurred that affect the amount of amps or number of feeds at any of the collocation sites listed in Attachment A or otherwise identified in Information Request No. 19(c), please identify the Verizon and AT&T individual personnel who have had such conversations, the substance of the conversations, the approximate date of such conversations and how these conversations relate to the DC power requirements requested or provided at each site;
- p) If Verizon is aware of occasions in which AT&T representatives explained to Verizon representatives the power requirements of any collocation site listed in Attachment A or of any additional sites identified in Verizon's response to Information Request No. 19(c), please identify such occasions, including dates, Verizon and AT&T representatives involved, and the substance of such explanations;

- q) Provide the tariff language, including the dates in which the tariff containing such language was filed and approved, that Verizon contends applies to billing for DC Power at each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c). If Verizon contends that the applicable tariff has changed since the first effective date of any collocation site (as identified in Information Request No. 19(d)), please provide each such tariff language applicable to such collocation site(s) and the dates of applicability;
  - r) For each collocation site listed in Attachment A and for any additional sites identified in Verizon's response to Information Request No. 19(c), please state whether Verizon provided a written document to AT&T, prior to any bill, which notified AT&T of the amount Verizon intended to charge AT&T for DC Power provided.
20. Other than tariff language provided in response to Information Request No. 19(q), please provide each and every other proposed tariff language, as filed with the Department of Telecommunications and Energy, with respect to DC Power charges for collocation arrangements with CLECs from the earliest first effective date of a collocation arrangement with AT&T identified in response to Information Request No. 19(d) until the date of the Complaint filed in this proceeding.
- 21.

Describe in detail the Verizon organization, including personnel and operating and communication procedures, for receiving applications for DC power, billing for such power and implementing such power delivery to collocation sites.

Respectfully submitted,  
AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.  
By its attorneys,

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June 5, 2001

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by hand or mail on June 5, 2001

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Jay E. Gruber